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# The Means and Method of the Conspiracy

The means and method employed by Defendants, BRIAN DE JESUS GUZMAN and PAUL SANTANA, and coconspirators to carry out the conspiracy and effect its unlawful objects are as follows:

- a. Between October and December of 2023, Defendants, BRIAN DE JESUS GUZMAN and PAUL SANTANA, and others known and unknown to the Grand Jury robbed multiple AutoZone Auto Parts stores in Maricopa County, employing a similar modus operandi each time.
- b. Defendants, BRIAN DE JESUS GUZMAN and PAUL SANTANA, would arrive at an AutoZone store near closing time, when the store would have extra cash on hand. Defendants then entered the store and ordered the employees or managers at gunpoint to the store office where the store safes were located. In the store office, Defendants demanded cash from the store safes which the employees would provide under threats of force or violence. Defendants also obtained cellular phones and other electronic communication devices from store employees to prevent them from calling police. Following the robberies, Defendants would flee the store and the scene in a vehicle.
- c. Defendants, BRIAN DE JESUS GUZMAN and PAUL SANTANA, and coconspirators were masks, gloves, and other dark clothing to conceal their identities from the witnesses and surveillance cameras.

#### **Overt Acts**

In furtherance of the conspiracy, and to effect the objects of the conspiracy, Defendants, BRIAN DE JESUS GUZMAN and PAUL SANTANA, and coconspirators committed, or caused to be committed, the following overt acts, among others, described below:

a. On or about October 25, 2023, at 11:20 p.m., Defendants, BRIAN DE JESUS GUZMAN and PAUL SANTANA, and one coconspirator traveled to the AutoZone Auto Parts store located at 2601 E. McDowell Road, Phoenix, Arizona 85008.

- b. Once there, one of the three entered the store, walked to the rear of the store, and unlocked to the rear door for the other two robbers to enter. At the time, all three robbers were wearing masks and other clothing to conceal their identities.
- c. Then, through threats of violence, force, and intimidation, Defendants, BRIAN DE JESUS GUZMAN and PAUL SANTANA, and at least one coconspirator, forced the store manager to the office where the store safe was located. There, Defendants, BRIAN DE JESUS GUZMAN and PAUL SANTANA, and at least one coconspirator stole over \$9,000 from the store safe and fled the store.
- d. On or about November 5, 2023, at 8:20 p.m., Defendants, BRIAN DE JESUS GUZMAN and PAUL SANTANA, traveled to the AutoZone Auto Parts store located at 1830 W. Southern Avenue, Phoenix, Arizona 85041.
- e. There, at least one Defendant brandished a firearm, ordered the employees to the store safe, and demanded they open it. Through threats of violence, force, and intimidation, the victims surrendered over \$2,000 in cash to Defendants, BRIAN DE JESUS GUZMAN and PAUL SANTANA, as well as their cellular phones. Defendants, BRIAN DE JESUS GUZMAN and PAUL SANTANA, then fled the store.
- f. At the time of the robbery, Defendants, BRIAN DE JESUS GUZMAN and PAUL SANTANA, were wearing masks, gloves, and dark clothing.
- g. On or about November 25, 2023, at 10:40 p.m., Defendants, BRIAN DE JESUS GUZMAN and PAUL SANTANA, traveled to the AutoZone Auto Parts store located at 3908 E. Thomas Road, Phoenix, Arizona 85018. In the parking lot of the store, Defendant, PAUL SANTANA, approached the AutoZone manager victim while Defendant, BRIAN DE JESUS GUZMAN, waited in the front passenger seat of the car in which they had arrived. Defendant, PAUL SANTANA, then pointed a gun at the manager victim and demanded the keys to the store.
- h. Defendant, PAUL SANTANA, was wearing a black mask, gloves, and other dark clothing at the time. Defendant, BRIAN DE JESUS GUZMAN, was also wearing

- a black mask and hoodie at the time.
- i. Defendant, PAUL SANTANA, then ordered the manager victim back into the store at gunpoint, and the manager victim threw the store keys up into the air and fled.
- j. In response, Defendant, PAUL SANTANA, discharged three rounds from the firearm.
- k. Defendants, BRIAN DE JESUS GUZMAN and PAUL SANTANA, then fled in a vehicle northbound on 39th Street.
- On or about November 26, 2023, at approximately 12:30 a.m., Defendants, BRIAN
  DE JESUS GUZMAN and PAUL SANTANA, traveled to the AutoZone Auto Parts
  store located at 333 E. Southern Avenue, Mesa, Arizona 85210. At the time,
  Defendants, BRIAN DE JESUS GUZMAN and PAUL SANTANA, were wearing
  black masks, gloves, and other dark clothing.
- m. Defendants, BRIAN DE JESUS GUZMAN and PAUL SANTANA, exited their vehicle and one Defendant pointed a firearm at the employees who were leaving the store after closing. Defendants, BRIAN DE JESUS GUZMAN and PAUL SANTANA, ordered the employees back into the store at gunpoint, telling them to disable the store alarm and to take them to the store safe.
- n. Through threats of violence, force, and intimidation, Defendants, BRIAN DE JESUS GUZMAN and PAUL SANTANA, took approximately \$750 from the store safe and the employees' cellular phones and smartwatches. Defendants, BRIAN DE JESUS GUZMAN and PAUL SANTANA, then fled the store and scene in a vehicle.
- o. On or about December 12, 2023, at approximately 9:40 p.m., Defendants, BRIAN DE JESUS GUZMAN and PAUL SANTANA, traveled to the AutoZone Auto Parts store located at 14 W. Baseline Road, Phoenix, Arizona 85041. At the time, Defendants, BRIAN DE JESUS GUZMAN and PAUL SANTANA, were wearing masks and dark clothing.
- p. There, Defendants, BRIAN DE JESUS GUZMAN and PAUL SANTANA, entered the store, ordered one employee victim to the rear of the store at gunpoint, and

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ordered him to the ground.

- q. In the rear of the store near the store safe, Defendants, BRIAN DE JESUS GUZMAN and PAUL SANTANA, demanded that the manager victim begin filling a backpack with cash from the safe.
- r. Defendants, BRIAN DE JESUS GUZMAN and PAUL SANTANA, ultimately stole approximately \$3,200 in cash and other merchandise and fled the store and scene in a vehicle.

All in violation of Title 18, United States Code, Section 371.

#### COUNT 2

On or about October 25, 2023, in the District of Arizona, Defendants, BRIAN DE JESUS GUZMAN and PAUL SANTANA, did unlawfully obstruct, delay, and affect commerce, as defined in 18 U.S.C. § 1951(b) and the movement of articles and commodities in such commerce, by robbery as defined in 18 U.S.C. § 1951(b), in that Defendants, BRIAN DE JESUS GUZMAN and PAUL SANTANA, did unlawfully take and obtain personal property consisting of United States currency from the person of or in the presence of the owner or possessor of the property of AutoZone, located at 2601 E. McDowell Road, Phoenix, Arizona 85008 against his/her will by means of actual and threatened force, violence, and fear of injury, immediate and future, to his/her person and the property in his/her custody and possession.

In violation of Title 18, United States Code, Section 1951.

# COUNT 3

On or about October 25, 2023, in the District of Arizona, Defendants, BRIAN DE JESUS GUZMAN and PAUL SANTANA, did knowingly use, carry, and brandish a firearm during and in relation to a crime of violence, and did knowingly possess and brandish a firearm in furtherance of a crime of violence, that is, Hobbs Act Robbery as alleged in Count 2, a felony prosecutable in a Court of the United States.

In violation of Title 18, United States Code, Section 924(c)(1)(A).

#### **COUNT 4**

On or about November 5, 2023, in the District of Arizona, Defendants, BRIAN DE JESUS GUZMAN and PAUL SANTANA, did unlawfully obstruct, delay, and affect commerce, as defined in 18 U.S.C. § 1951(b) and the movement of articles and commodities in such commerce, by robbery as defined in 18 U.S.C. § 1951(b), in that Defendants, BRIAN DE JESUS GUZMAN and PAUL SANTANA, did unlawfully take and obtain personal property consisting of United States currency from the person of or in the presence of the owner or possessor of the property of AutoZone, located at 1830 W. Southern Avenue, Phoenix, Arizona 85041 against his/her will by means of actual and threatened force, violence, and fear of injury, immediate and future, to his/her person and the property in his/her custody and possession.

In violation of Title 18, United States Code, Section 1951.

### COUNT 5

On or about November 5, 2023, in the District of Arizona, Defendants, BRIAN DE JESUS GUZMAN and PAUL SANTANA, did knowingly use, carry, and brandish a firearm during and in relation to a crime of violence, and did knowingly possess and brandish a firearm in furtherance of a crime of violence, that is, Hobbs Act Robbery as alleged in Count 4, a felony prosecutable in a Court of the United States.

In violation of Title 18, United States Code, Section 924(c)(1)(A).

## **COUNT 6**

On or about November 25, 2023, in the District of Arizona, Defendants, BRIAN DE JESUS GUZMAN and PAUL SANTANA, did attempt to unlawfully obstruct, delay, and affect commerce, as defined in 18 U.S.C. § 1951(b) and the movement of articles and commodities in such commerce, by attempting to commit a robbery as defined in 18 U.S.C. § 1951(b), in that Defendants, BRIAN DE JESUS GUZMAN and PAUL SANTANA, did attempt to unlawfully take and obtain personal property consisting of United States currency from the person of or in the presence of the owner or possessor of the property of AutoZone, located at 3908 E. Thomas Road, Phoenix, Arizona 85018, against his/her will

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by means of actual and threatened force, violence, and fear of injury, immediate and future, to his/her person and the property in his/her custody and possession.

In violation of Title 18, United States Code, Section 1951.

### COUNT 7

On or about November 26, 2023, in the District of Arizona, Defendants, BRIAN DE JESUS GUZMAN and PAUL SANTANA, did unlawfully obstruct, delay, and affect commerce, as defined in 18 U.S.C. § 1951(b) and the movement of articles and commodities in such commerce, by robbery as defined in 18 U.S.C. § 1951(b), in that Defendants, BRIAN DE JESUS GUZMAN and PAUL SANTANA, did unlawfully take and obtain personal property consisting of United States currency from the person of or in the presence of the owner or possessor of the property of AutoZone, located at 333 E. Southern Avenue, Mesa, Arizona 85210 against his/her will by means of actual and threatened force, violence, and fear of injury, immediate and future, to his/her person and the property in his/her custody and possession.

In violation of Title 18, United States Code, Section 1951.

### **COUNT 8**

On or about November 26, 2023, in the District of Arizona, Defendants, BRIAN DE JESUS GUZMAN and PAUL SANTANA, did knowingly use, carry, and brandish a firearm during and in relation to a crime of violence, and did knowingly possess and brandish a firearm in furtherance of a crime of violence, that is, Hobbs Act Robbery as alleged in Count 7, a felony prosecutable in a Court of the United States.

In violation of Title 18, United States Code, Section 924(c)(1)(A).

## COUNT 9

On or about December 12, 2023, in the District of Arizona, Defendants, BRIAN DE JESUS GUZMAN and PAUL SANTANA, did unlawfully obstruct, delay, and affect commerce, as defined in 18 U.S.C. § 1951(b) and the movement of articles and commodities in such commerce, by robbery as defined in 18 U.S.C. § 1951(b), in that Defendants, BRIAN DE JESUS GUZMAN and PAUL SANTANA, did unlawfully take and obtain personal property consisting of United States currency, one tool set, and one jump starter, from the person of or in the presence of the owner or possessor of the property of AutoZone, located at 14 W. Baseline Road, Phoenix, Arizona 85041 against his/her will by means of actual and threatened force, violence, and fear of injury, immediate and future, to his/her person and the property in his/her custody and possession.

In violation of Title 18, United States Code, Section 1951.

### **COUNT 10**

On or about December 12, 2023, in the District of Arizona, Defendants, BRIAN DE JESUS GUZMAN and PAUL SANTANA, did knowingly use, carry, and brandish a firearm during and in relation to a crime of violence, and did knowingly possess and brandish a firearm in furtherance of a crime of violence, that is, Hobbs Act Robbery as alleged in Count 9, a felony prosecutable in a Court of the United States.

In violation of Title 18, United States Code, Section 924(c)(1)(A).

#### A TRUE BILL

FOREPERSON OF THE GRAND JURY Date: April 8, 2025

TIMOTHY COURCHAINE United States Attorney District of Arizona

S/ PATRICK E. CHAPMAN Assistant U.S. Attorney

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